

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

MOST VALUABLE PERSONNEL, LLC,
ANDREA MIHELIC, INDIVIDUALLY
Plaintiff,

VS.

DOCKET NO. 3:13-cv-252-DAS

CLAY AND WRIGHT INSURANCE, INC.,
and DEBBIE MCNEAL, INDIVIDUALLY,

Defendants.

DEFENDANTS, CLAY AND WRIGHT INSURANCE, INC. AND DEBBIE MCNEAL'S
MOTION TO STRIKE PLAINTIFFS' EXPERT, BRENT KORZECKI, OR, IN THE
ALTERNATIVE, STRIKE THE TESTIMONY OF BRENT KORZECKI

COME NOW DEFENDANTS, Clay and Wright Insurance, Inc. and Debbie McNeal, and respectfully move this Court to strike Plaintiffs' Expert, Brent Korzecki or, in the alternative, exclude the specific opinions and testimony of Brent Korzecki. For grounds and as more fully presented in their Memorandum Brief filed in this matter, Defendants state as follows:

1. Plaintiffs disclosed Brent Korzecki as an expert in the field of business and insurance.
2. Plaintiff's expert, Brent Korzecki is not qualified to testify as an expert in the field of business and insurance as he fails to satisfy the standards set forth in *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993).
3. Plaintiff's expert, Brent Korzecki's opinions fail to satisfy the requirements of reliability and relevancy.
4. Brent Korzecki fails to satisfy the requirements for expert testimony pursuant to Rule 702 of the Federal Rules of Evidence.

In support of this Motion, Defendants rely on the Memorandum Brief filed contemporaneously with this Motion.

WHEREFORE, Defendants request this Court exclude Brent Korzecki as Plaintiff's expert or, in the alternative, strike his opinions and testimony, and to further provide them any other relief appropriate under the circumstances, including but not limited to awarding them all costs and attorneys' fees incurred.

Respectfully submitted,

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Insurance, Inc. and Debbie McNeal*

s/Rebecca Adelman
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to the following:

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This 11th day of January, 2016.

s/Rebecca Adelman